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July 1, 2021

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *BRG Harrison Lofts Urban Renewal LLC v. General Electric Company, et al.* (the “BRG Action”) and *Evanston Insurance Company v. Accredited Environmental Technologies, Inc., et al.* (the “Evanston Action”),  
Consolidated Action No. 2:16-cv-06577 (SRC-CLW)

Dear Judge Waldor:

We represent Plaintiff BRG Harrison Lofts Urban Renewal LLC in this consolidated matter and write on behalf of all parties. We write in connection with the status conference scheduled to take place over Zoom today, July 1, 2021.

Since our settlement conference in March, Plaintiff BRG has supplemented its document production and responded to requests for additional information from opposing counsel cooperatively. The deposition of BRG’s 30(b)(6) witness and primary fact witness is scheduled to take place on July 15 partially in person and partially remote, and depositions of EWMA and AET representatives will follow in coordination with the insurance parties. Specifically, AET will produce Eric Houseknecht and Roy Mosicant for depositions applicable to both cases and will communicate with counsel in the insurance case in connection with the scheduling of those depositions.

Certain depositions in the insurance action have already taken place, and the parties are awaiting a production of claim notes by Evanston. Counsel for Evanston will produce the requested claim notes within thirty (30) days, no later than Friday, July 30, 2021.

July 1, 2021  
Page 2

In light of the ongoing status of discovery and the general cooperation among the parties to date, we respectfully request that the status conference tomorrow be postponed to later in the summer after the first round of depositions take place

Respectfully submitted,

*/s/ Dennis M. Toft*

DENNIS M. TOFT

cc: All Counsel via ECF